

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
Case No. 5:18-cv-00148-FL**

BETTY EILEEN DONOVAN,)	
)	
Plaintiff,)	
)	
v.)	
)	
BRAGG MUTUAL FEDERAL CREDIT UNION)	
and JOHN SZOKA, individually,)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER

Plaintiff Betty Eileen Donovan (“Plaintiff”) and Defendants Bragg Mutual Federal Credit Union and John Szoka (“Defendants”) (collectively, the “Parties”) move pursuant to Federal Rule of Civil Procedure 26(c) for the entry of the attached proposed Consent Protective Order concerning confidential information which may be produced in discovery, or otherwise revealed during the course of this action. In support of this Motion, the Parties respectfully state as follows:

1. The Parties have agreed upon the need for a protective order regarding confidential personal and business information, among other things.
2. The Parties agree that the attached proposed Consent Protective Order will reasonably preserve the confidentiality of such information.
3. This Motion is made in good faith and for good cause.

WHEREFORE, the Parties respectfully request that the Court grant this Motion and enter the attached proposed Consent Protective Order.

This the 4th day of September, 2018.

/s/ Nicholas J. Sanservino, Jr.

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